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August 29, 2017

**VIA ECF AND HAND DELIVERY**

The Honorable Dora L. Irizarry  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: *United States v. Nordlicht, et al.*, 16 Cr. 640 (DLI)**

Dear Chief Judge Irizarry:

We write on behalf of Defendant Mark Nordlicht regarding the Court's August 18, 2017 order and the clarification of that order during the status conference held yesterday, August 28, 2017. The Court's August 18, 2017 minute entry stated:

Defense counsel and defendant are ordered to desist from making any efforts to communicate with any government witnesses or their attorneys upon pain of sanctions, finding of contempt, and remand of the defendant.

Order (Aug. 18, 2017). At the August 28, 2017 status conference, the Court stated that this order was meant to address only correspondence whose tone is unduly confrontational, aggressive or potentially intimidating.

In light of the Court's helpful clarification, we respectfully request that the Court rescind its August 18, 2017 order and replace it with the following order:

Defense counsel for Defendant Mark Nordlicht have the right to communicate with potential government witnesses and their counsel in preparing Mr. Nordlicht's defense, but shall not communicate or interact with those witnesses or their counsel in an intimidating manner.

**quinn emanuel urquhart & sullivan, llp**

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We have conferred with counsel for the government, who consent to Mr. Nordlicht's request for rescission of the August 18, 2017 order and its replacement with the suggested order set forth herein.

Respectfully submitted,

/s/ William A. Burck  
William A. Burck

cc: All Counsel of Record (by ECF)